UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Tony Terrell Robinson,

Court File No. 17-CV-0437 (DSD/KMM)

Plaintiff,

v.

Minnesota Department of Corrections, et al.

MEET AND CONFER STATEMENT REGARDING DEFENDANT STEPHEN DANNEWITZ, M.D.'S MOTION TO COMPEL

Defendants.

I, Nicole L. Brand, counsel for defendant Stephen Dannewitz, M.D., hereby certify that:

I was unable to meet and confer with plaintiff Tony Terrell Robinson before filing the pending motion to dismiss. Robinson is acting pro se and is incarcerated in federal prison; I therefore had no means by which to discuss the subject matter of the pending motion with him.

I, however, exchanged numerous items of correspondence attempting to meet and confer, including those dated May 8, 2018; July 18, 2018; August 14, 2018; and September 6, 2018, regarding the discovery at issue in a good faith attempt to avoid the need for motion practice.

As a result of the meet-and-confer letters, the parties were not able to agree on the resolution of any part of the motion.

Dated: November 26, 2018 By: S/Nicole L. Brand

Nicole L. Brand (#299546) Kate C. Johnson (#0398240) Besse H. McDonald (#0398662)

Meagher & Geer, PLLP

33 South Sixth Street, Suite 4400

Minneapolis, MN 55402

(612) 338-0661

nbrand@meagher.com kjohnson@meagher.com bmcdonald@meagher.com

Attorneys for Defendant Stephen Dannewitz, M.D.

12368695.1